



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

FJN/JPL/NDB/RMP
F. #2019R00935 / OCDETF #NY-NYE-874H

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 5, 2024

By ECF and Hand

The Honorable Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Mohammad Bazzi
Criminal Docket No. 23-041 (DLI)

Dear Judge Irizarry:

The government respectfully submits this letter on behalf of the parties to request that the Court schedule a change of plea and enter an order excluding time until the plea date pursuant to the Speedy Trial Act. As noted in the prior status update, the parties have reached an agreement for a resolution short of trial, and the government is now advised by defense counsel that the defendant is prepared to schedule the change of plea. The parties have conferred with each other and with Your Honor's case manager about mutually convenient dates and the parties understand that the Court is available on September 20, 2024. The parties jointly request that the Court schedule a change of plea on that date, preferably for a time after 10:00 a.m. and before 3:00 p.m. if such a schedule is convenient for Your Honor. Additionally, the parties jointly request that the Court enter an order excluding the time until September 20 from speedy-trial calculations to facilitate the parties' preparation for the plea. The parties respectfully submit that

the interests of justice served by such exclusion outweigh the interests of the defendant and the public in a speedy trial.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: Clerk of the Court (DLI)
Defense counsel